

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

<b>HMD GLOBAL OY,</b>	§	
	§	
<b>Movant,</b>	§	
	§	C.A. No. 2:21-mc-00002-JRG
<b>v.</b>	§	
	§	
<b>ACACIA RESEARCH CORPORATION,</b>	§	
	§	
<b>Respondent.</b>	§	
	§	

**JOINT MOTION TO STAY ALL DEADLINES**

In the underlying case related to this miscellaneous matter, *Cellular Communications Equipment LLC v. HMD Global Oy*, Case No. 2:20-CV-78-JRG (E.D. Texas), Movant HMD Global Oy (“HMD Global”) has notified the Court that it has reached a settlement in principle of all matters in controversy with the Plaintiff in the underlying matter, Cellular Communications Equipment LLC (“CCE”). Accordingly, the parties to this matter, HMD Global and Respondent, Acacia Research Corporation (“ARC”) (collectively, the “Parties”), respectfully submit this Joint Motion to Stay All Deadlines. The Parties would respectfully inform the Court as follows:

Based on the Joint Motion filed by HMD Global and CCE stating that they have reached a settlement in principle of all matters in controversy, pending documentation, the Parties hereby request that the Court stay all deadlines in this matter for thirty (30) days. A proposed order is submitted herewith.

Dated: January 29, 2021

Respectfully submitted,

<p><u>/s/Jeffrey R. Bragalone</u> Jeffrey R. Bragalone (lead attorney) Texas Bar No. 02855775</p> <p><b>BRAGALONE CONROY PC</b> 2200 Ross Avenue Suite 4500W Dallas, TX 75201 Tel: (214) 785-6670 Fax: (214) 785-6680 jbragalone@bcpc-law.com</p> <p><b>ATTORNEYS FOR RESPONDENT ACACIA RESEARCH CORPORATION</b></p>	<p><u>/s/ Deron R. Dacus</u> Deron R. Dacus State Bar No. 00790553 <b>The Dacus Firm, P.C.</b> 821 ESE Loop 323, Suite 430 Tyler, Texas, 75701 +1 (903) 705-1117 +1 (903) 581-2543 facsimile ddacus@dacusfirm.com</p> <p>Matthew S. Warren (California Bar No. 230565) Jen Kash (California Bar No. 203679) Erika Warren (California Bar No. 295570) <b>Warren Lex LLP</b> 2261 Market Street, No. 606 San Francisco, California, 94114 +1 (415) 895-2940 +1 (415) 895-2964 facsimile 20-78@cases.warrenlex.com</p> <p><b>ATTORNEYS FOR MOVANT HMD GLOBAL OY</b></p>
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**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule CV-7(h), (i), I certify that counsel for CCE conferred with counsel for HMD on January 29, 2021 via email exchanges and, as reflected in the body of the Motion, the Parties agree to the form and substance of the Motion, the Motion is unopposed, and the parties jointly submit it to the Court.

*/s/ Jeffrey R. Bragalone*  
Jeffrey R. Bragalone

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on January 29, 2021.

*/s/ Jeffrey R. Bragalone*  
Jeffrey R. Bragalone